

### Remarks

Entry of the amendments, reconsideration of the application, as amended, and allowance of all pending claims are respectfully requested. Claims 1-46 remain pending.

In the above amendments, the independent claims are amended to explicitly indicate that the another zone in which data is being moved to is dynamically selected. Support for this amendment can be found throughout the specification (see, e.g., FIG. 8 and the accompanying specification on, for instance, pp. 19-20, which describe a destination address). Thus, no new matter is being added.

In the Office Action dated May 28, 2003, the drawings are objected to as failing to comply with 37 C.F.R. 1.84(b)(5) because they include reference signs not mentioned in the description. In an effort to overcome this objection, applicants have amended FIG. 4 by deleting those reference signs. Thus, applicants respectfully request withdrawal of the objection.

Additionally, the title of the invention is objected to as not being descriptive. Without acquiescing to this objection, applicants provide herewith a new title which applicants respectfully submit is descriptive of the claimed invention. Therefore, applicants respectfully request withdrawal of the objection.

Moreover, claims 1-2, 4-14, 16-20, 41 and 43-46 are rejected under 35 U.S.C. 102(e) as being anticipated by Wright et al. (U.S. Patent No. 6,195,739). Further, claims 3, 15 and 42 are rejected under 35 U.S.C. 103(a) as being unpatentable over Wright et al. Applicants respectfully, but most strenuously, traverse this rejection to any extent deemed applicable to the amended claims for the reasons below.

In one aspect, applicants' invention is directed to moving data between zones of a central processing complex. As one example, data can be moved from any place in memory of one zone to any place in memory of another zone. The zone to receive the data is dynamically selected by, for instance, indicating the zone and address to which the data is to be sent. For example, it may be decided that data is to be moved from Zone 1 to Zone 3. Thus, the destination zone, Zone 3, and an address to receive the data are provided. This enables dynamic selection of the zone.

In one particular example, applicants claim a method of moving data between zones of a central processing complex (e.g., claim 1). The method includes, for instance, initiating a move of data from one zone of the central processing complex to another zone of the central processing complex, wherein the another zone is dynamically selected; and moving the data from the one zone to the another zone without using a channel interface and without using processor instructions. Thus, in applicants' claimed invention, data can be moved from one zone to another zone and the zone to receive the data is dynamically selected. That is, the zones do not have to be preset to one another. This is very different from the teachings of Wright.

While Wright describes moving data, the movement of data in Wright is very different from that claimed by applicants. In Wright, the data is moved among different stages of a pipelined processing engine. That is, data is moved from one processing element to the next processing element of a pipelined engine. This is shown, for instance, in FIG. 3 and discussed, for instance, in Col. 8, lines 40-44. As shown in FIG. 3, the processing elements are preset to one another. That is, the data from one processing element always moves to the same next processing element. The path is static, and thus, there is no choosing of which processing element the data is to be sent. In contrast, in applicants' claimed invention, the zone that is to receive the data is dynamically selected. This is described in applicants' specification on, for instance, page 19, lines 1-12. In that section, it specifically states that the destination where the data is to go is designated by a zone id and an address within the zone. Thus, the destination of the data is dynamically selected. There is no such discussion in Wright as being able to dynamically select the destination for the data. Again, instead in Wright, the environment is a pipelined environment and the path of the processing elements is static and preset. Thus, applicants respectfully submit that their invention is not described, taught or suggested by Wright et al.

Since Wright fails to describe, teach or suggest at the very least dynamically selecting the zone which is to receive the data, applicants respectfully request an indication of allowability for independent claim 1, as well as the other independent claims. The dependent claims are patentable for the same reasons as the independent claims, as well as for their own additional features. Thus, applicants respectfully request an indication of allowability for all pending claims.

Should the Examiner wish to discuss this case with applicants' attorney, please call applicants' attorney at the below listed number.

Respectfully submitted,

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